



February 10, 2021

Honorable Judge Tonianne J. Bongiovanni  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State, Room 2020  
Trenton, NJ 08608

**RE: JOSEPH FAILLA v. GEORGE'S FOODS, LLC, ET AL.  
CIVIL ACTION NO. 3:20-cv-07109-BRM-TJB**

Dear Judge Bongiovanni,

We represent Joseph Failla in the above-referenced case.

The parties currently have a status conference call scheduled before Your Honor on February 11, 2021 at 10AM. The parties jointly submit this letter to apprise the Court of the status of discovery in the case. The parties have already exchanged written discovery. The Plaintiff has already been deposed, and depositions are scheduled for a corporate witness from Defendant George's Foods on February 17, and of a non-party witness on February 26, 2021. The parties anticipate conducting additional depositions in March.

Given that the parties are working cooperatively and collaboratively to complete discovery in this case, we believe it would be most productive to adjourn the February 11, 2021 conference to a date in mid-March.

We appreciate the Court's consideration.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "David T. Sirotkin", is written over a horizontal line. The signature is stylized with loops and flourishes.

David T. Sirotkin, Esq.

**Morelli Law Firm PLLC**

777 Third Avenue, 31st Floor  
New York, New York 10017

Tel: (212) 751-9800 Fax: (212) 751-0046 Toll Free: (877) 751-9800

[www.morellilaw.com](http://www.morellilaw.com)

CC:

Paul Daly

Hardin, Kundla, McKeon & Poletto

